

Charleston, South Carolina. At that meeting, they proposed two business arrangements to me. First, they proposed partnering with me in my shop in Mint Hill, North Carolina, and performing tinting and pinstriping there. Second, they proposed that I help handle their ongoing business in Venice, Florida, at the Venice Honda and Venice Toyota dealerships. That business, which was conducted as Atlantic Dealer Services Coastal, LLC (“Atlantic Dealer Services Coastal”), involves performing tinting and pinstriping. I moved to Florida in March 2016 to handle the tinting part of that business.

6. While working in the Florida dealerships, I became acquainted with two individuals in the pinstriping part of the business. Brian (whose last name I do not know) supervised the pinstriping operation. Cameron Hauss, grandson of Jerry Parker, performed pinstriping.

7. I recently became aware that Atlantic had terminated the franchises operated by Tony Horne, Ernie Horne, and Jerry Parker in or about June 2016. Because I worked for Tony Horne, Ernie Horne, and Jerry Parker through Atlantic Dealer Services Coastal, I know that they continued to pinstripe cars in Charleston, South Carolina, using Atlantic Pinstriping’s applicator and the Atlantic Dealer Services name as recently as last week, when I resigned my employment with them.

8. Approximately two weeks ago, while I was in the tinting bay at the Venice Honda dealership, Brian and Cameron approached me with the pinstriping applicator they were using. They wanted my assistance adjusting the applicator to help it perform better. I held the applicator in my hands and noticed that it looked similar to Atlantic’s applicator. I also noticed that the adjustment arm was exactly the same as Atlantic’s applicator.

9. I was told by another employee, named Justin Wilson, that Jerry Parker had

purchased a 3-D printer and had enlisted the assistance of an engineering student, named Nick Gorman, to reverse engineer and copy Atlantic's patented applicator for use by Cameron and others to perform pinstriping. I saw this applicator being used for that purpose.

10. Atlantic Dealer Services Coastal was pinstriping cars in Venice, Florida, at the Venice Honda and Venice Toyota dealerships as recently as two weeks ago.

11. I resigned from my position with Atlantic Dealer Services Coastal as of August 17, 2016, but I am still residing in Florida.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed August 25th, 2016, at Venice, Florida.

By: _____

Wayne Powell

CERTIFICATE OF SERVICE

I certify that on August 25, 2016, I served the foregoing **DECLARATION OF WAYNE POWELL** on all parties of record via ECF/CM electronic filing, which will send notification of the same to counsel for all parties of record.

/s/ Matthew S. DeAntonio

Matthew S. DeAntonio

Counsel for Plaintiffs